

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
01/26/10	Sanford M. Saunders, Jr.	Preparation for and telephone conference with BSI counsel; telephone conference and email with K. Horky and J. McManus re: same.	0.4	250.00
02/01/10	Sanford M. Saunders, Jr.	Email correspondence and telephone conversation with K Horky and J McManus re: BSI 3rd party subpoenas; telephone conversation with BSI counsel re same.	1.5	937.50
02/02/10	Nicoleta Timofti	Review draft motion on 85 subpoenas	1.0	290.00
02/02/10	Sanford M. Saunders, Jr.	Telephone conversation with J McManus re: 3rd party subpoenas and Motion to Quash same; review same; conference call with client, K Horky and J McManus re: same.	2.0	1,250.00
02/02/10	Kenneth A. Horky	Work on motion to quash	2.0	920.00
02/02/10	John L. McManus	Work on the Motion to Quash as to the 85 subpoenas	2.0	900.00
02/03/10	Nicoleta Timofti	Draft letter request for expedited briefing and hearing on the Motion on 85 Subpoenas; multiple correspondence with counsel on same; review and finalize final pleadings and exhibits; file same with court	6.0	1,740.00
02/03/10	Sanford M. Saunders, Jr.	Review Motion to Quash and telephone conversation with K Horky and J McManus re: motions to compel; follow up w/ BSI counsel re: same	1.5	937.50
02/03/10	Kenneth A. Horky	Continue working on motion to quash; communications re: same; further work on motion to quash and supporting affidavits	4.9	2,254.00
02/03/10	John L. McManus	Work on multiple telephone conferences with associate and co-counsel and client re: the upcoming filing of motion to quash; work on review of client comments on motion to quash; work on discussion of timing and good faith efforts	1.0	450.00
02/04/10	Sanford M. Saunders, Jr.	Multiple telephone conversation and emails re: BSI 3rd party subpoenas	1.5	937.50
02/04/10	John L. McManus	Work on motion to quash 85 unknown subpoenas; work on research re: same; work on edits to both of the Motions; work on edits to both of the Declarations; telephone calls with clients re: same	2.0	900.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
02/05/10	Sanford M. Saunders, Jr.	Email and telephone conversation with BSI counsel re: motions and subpoenas	0.9	562.50
02/08/10	Kenneth A. Horky	Work on motion to quash	1.3	598.00
02/19/10	John L. McManus	Work on call with client regarding motion to quash specific subpoenas	0.5	225.00
02/22/10	Sanford M. Saunders, Jr.	Emails re: discovery issues	0.3	187.50
02/22/10	Kenneth A. Horky	Review 20 subpoenas issued by attorney Rothman; teleconference with Sandy Saunders	0.7	322.00
02/23/10	Kenneth A. Horky	Review response to motion to quash 85 subpoenas, motion for contempt and sanctions, supplement to motion for contempt and sanctions; confer with cocounsel re: filings	0.8	368.00
02/23/10	Justin Angelo	Receipt and review of BSI's memorandum in opposition to WAUSA's motion to quash 85 subpoenas; worked on draft of reply in support of motion to quash 85 non-party subpoenas	1.5	495.00
02/24/10	Sanford M. Saunders, Jr.	Review BSI filings	1.0	625.00
02/24/10	Kenneth A. Horky	Confer re: subpoena position	0.2	92.00
02/25/10	Kenneth A. Horky	Work on third party subpoena issues	0.4	184.00
02/28/10	John L. McManus	Work on comments on and circulation of Reply Brief in support of motion to quash 85 unknown subpoenas	0.5	225.00
03/01/10	John L. McManus	Finalize the draft of the Reply Memorandum in Support of the Motion to Quash 85 Unknown Subpoenas; conference call with co-counsel	1.0	450.00
03/02/10	Kenneth A. Horky	Review reply in support of motion to quash 85 unknown subpoenas; confer with cocounsel re: status of all pending initiatives	0.7	322.00
03/15/10	Kenneth A. Horky	Review as-filed reply in support of motion to quash	0.1	46.00
03/25/10	Nicoleta Timofti	Participate at the conference call with the expert, GT counsel and client on all third party production in responses to subpoenas and their relevance to the expert report	4.0	1,160.00
04/08/10	Kenneth A. Horky	Review subpoenas served by BSI (Enom, etc)	1.3	598.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
05/26/10	Nicoleta Timofti	Review draft letter to M. Rothman on the 85 subpoenas and email correspondence with counsel on same; review the decision in Azoogole on sanctions and attorneys fees for abuse of process; review appellate court's decision in Azoogole; email correspondence with counsel on same	1.0	290.00
05/26/10	Kenneth A. Horky	Work on response to opposing counsel; confer with cocounsel; teleconference with Dale Baker; review draft correspondence to attorney Rothman; instructions re: same; analysis, comments and communications re: potential direct claim for abuse of process for BSI's misuse of subpoena power; work on obtaining information following discussion; further communications with McManus; review new research circulated by Nicoleta [Timofti]	4.0	1,840.00
05/26/10	John L. McManus	Work on review of Mike Rothman's May 21, 2010 letter with enclosures; work on e-mails with co-counsel re: same; work on preparation of 11-page response re: same, including discovery and uncovering of evidence of fraud upon the Court and production of bogus subpoenas; circulate proposed letter to the team with the suggestion to convert it into a reply brief; receive and review of multiple comments re: same	5.9	2,655.00
05/27/10	John L. McManus	Work on email to associate re: research project on abuse of process and defamation; work on locating and circulating e-mail of a third party who was served with the subpoena that is the subject of the fraud on the court claim	0.2	90.00
05/27/10	Justin Angelo	Review of proposed letter to BSI detailing fraud on the court in prep for research on abuse of process; began research into abuse of process claim against BSI	0.7	231.00
05/27/10	Kenneth A. Horky	Review communications on Netflix subpoena; confer with John McManus on direct claim issues	0.3	138.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
05/28/10	Justin Angelo	Completed research under Maryland law re: abuse of process; research all jurisdictions for precedent on abuse of process in context of subpoenas with misrepresentations; draft summary of research findings for John McManus	4.8	1,584.00
05/31/10	Kenneth A. Horky	Review abuse of process research and communications re: same	0.9	414.00
06/01/10	Kenneth A. Horky	Communications with client re: discovery issues; further communications with client re: strategy decisions; teleconference with Jeff Richard; compare original categories (from responses) to subpoenas subsequently provided; analysis of potential causes of action, grounds for sanctions; confer with cocounsel; long discussion with John McManus re: series of motions to prepare and file based on discovery of original and phony subpoenas and surrounding circumstances	5.6	2,576.00
06/01/10	John L. McManus	Work on e-mails to co-counsel re: research; work on e-mails to associate re: new research projects	2.0	900.00
06/02/10	Sanford M. Saunders, Jr.	Emails with BSI counsel re: discovery issues; emails with K. Horky and J. McManus re: same	0.8	500.00
06/02/10	Kenneth A. Horky	Review crime/fraud exception research; review further crime/fraud exception caselaw	2.3	1,058.00
06/02/10	John L. McManus	Draft motion for sanctions for violation of court order	1.0	450.00
06/03/10	Kenneth A. Horky	Work on analysis of abuse of process claim and damages issues; various communications	1.2	552.00
06/03/10	Justin Angelo	Began research re: fraud on the court for certain discovery misrepresentations	0.8	264.00
06/03/10	Barry A. Dotson	Continue researching plaintiff's third party productions	1.0	205.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
06/04/10	Kenneth A. Horky	Communications with working group and client re: case developments; several teleconferences with Dale Baker; teleconference with Mark Schnapp; forward materials to Schnapp; subsequent communications, series of updates to client on case events, related communications; review fraud on court research; further communications; analysis of crime/fraud exception to attorney client privilege; extended teleconference with Dale Baker and Niuniu Ji; teleconference with Sandy Saunders; work on development of potential damages claim	5.6	2,576.00
06/04/10	Justin Angelo	Completed research re: fraud on the court issues and drafted outline summarizing research; research defamation choice of law issue; drafted outline summarizing findings; research scope of litigation privilege as bar to defamation suits under Maryland law; drafted outline summarizing findings	5.8	1,914.00
06/06/10	Justin Angelo	Research whether fees are part of damages for abuse of process under Maryland law	1.3	429.00
06/07/10	Justin Angelo	Completed research re: abuse of process damages issue; research re: cases where courts found abuse of process based on attempts to coerce settlement	2.2	726.00
06/11/10	Kenneth A. Horky	Communications with Dale Baker; followup with Mark Schnapp on crime/fraud exception issues; initial review of draft, and work on memorandum of law in support of motion to strike pleadings for fraud on court	3.3	1,518.00
06/11/10	Barry A. Dotson	Work with memo in support of striking pleadings to identify and collect exhibits; review pleadings and prepare list of plaintiff's 3rd party subpoenas issued for further analysis by attorneys	1.5	307.50
06/11/10	John L. McManus	Begin research on motion to strike	4.0	1,800.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
06/14/10	Kenneth A. Horky	Review further abuse of process caselaw; followup re: same; teleconference with Dale Baker; work on further issues concerning motion to strike pleadings; work on potential damages issues; teleconference ;with Bruce March; review email from Homer Appleby	3.6	1,656.00
06/14/10	John L. McManus	Telephone call re: status; work on motion to strike pleadings for fraud on the court	3.5	1,575.00
06/14/10	Barry A. Dotson	Receive and process plaintiff's transmittal of additional third party subpoenas for uploading to FileSite and eRoom; prepare Request for Copies relating to third party subpoenas issued to date by plaintiff	1.0	205.00
06/14/10	Justin Angelo	Research re: sanctions for repeated service of oppressive subpoenas; research re: quashing subpoena where document requests are facially objectionable	4.2	1,386.00
06/15/10	John L. McManus	Work on Memorandum of Law in support of Motion to dismiss for fraud on the Court	4.0	1,800.00
06/15/10	Kenneth A. Horky	Analysis of abuse of process research; work on development of arguments re: BSI's actions amounting to a seizure of property, thereby satisfying damages element of claim; teleconference with cocounsel; continue working on motion to strike pleadings; continue working on strike pleadings/fraud on court motion	4.2	1,932.00
06/15/10	Justin Angelo	Research re: cases where courts struck pleadings for fraud on the court based on fraud in motion or subpoena	1.3	429.00
06/16/10	Kenneth A. Horky	Work on motion to strike pleadings for fraud on court; teleconference with Dale Baker; followup re: crime/fraud exception to attorney client privilege analysis; review notice of issuance of subpoenas to nonparties; review Newservers subpoena response; review request for copies; confer with John McManus	2.6	1,196.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
06/16/10	Justin Angelo	Completed research re: fraudulent statements as basis for striking pleadings; drafted insert for memorandum on fraud on the court	3.7	1,221.00
06/16/10	John L. McManus	Continued work on motion to strike pleadings for fraud on the court	5.3	2,385.00
06/16/10	Barry A. Dotson	Receive and process Newsservers response to subpoena and Request for Copies directed to plaintiff	0.4	82.00
06/17/10	Nicoleta Timofti	Revise and edit Motion to dismiss for fraud on Court; conference call with counsel for Kraft re two Kraft subpoenas sent by BSI and obtaining copies of same	3.5	1,015.00
06/17/10	Sanford M. Saunders, Jr.	Review and revise fraud on the court motion and dedesignation motion; email K. Horky, J. McManus and N. [Timofti] re: same; emails with BSI counsel re: discovery issues	3.0	1,875.00
06/17/10	Kenneth A. Horky	Review revised version of motion to dismiss for fraud on the court; communications with Dale Baker re: same; lengthy conference call with working ground on motion to dismiss for fraud on court; followup communications with cocounsel	1.2	552.00
06/17/10	Justin Angelo	Research under Maryland law cases where court held procuring confidential or proprietary information constitutes seizure of property for abuse of process claim	1.7	561.00
06/17/10	John L. McManus	Work on motion to strike pleadings for fraud on the court	6.0	2,700.00
06/18/10	Nicoleta Timofti	Multiple calls with counsel for Kraft (D. Graham) re subpoenas issued to Kraft by BSI	4.0	1,160.00
06/18/10	Sanford M. Saunders, Jr.	Conference call with K. Horky and J. McManus re: draft motions and discovery issues; consult with N. [Timofti] re: same; revise de-designation motion and fraud on the court motion; email BSI counsel re: discovery issues	2.9	1,812.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
06/18/10	Kenneth A. Horky	Review new subpoenas received from third parties; teleconference with Dale Baker and John McManus; confer with Mark Schnapp re: potential crimes for crime/fraud exception argument; continue working on revising motion to dismiss for fraud on court; review memo on extortion and extortion-related crimes; work on editing and revising motion to dismiss for fraud on court; work on exhibits to motion; all hands conference call re: responses to various discovery requests, position to take on extension requests, numerous discovery strategy issues and content of motion to dismiss for fraud on court	4.6	2,116.00
06/18/10	Justin Angelo	Completed abuse of process research re: whether procuring confidential information constitutes "seizure of property"	0.4	132.00
06/18/10	John L. McManus	Work on exhibits; work on call with Dale Baker; work on memorandum of law in support of motion to strike pleadings for fraud on the court	2.5	1,125.00
06/18/10	Barry A. Dotson	Receive and work with communications regarding discovery issues; work with exhibits to motion to dismiss in preparation for filing	4.0	820.00
06/20/10	John L. McManus	Work on edits on Motion to Dismiss for Fraud on the Court	0.7	315.00
06/21/10	Nicoleta Timofti	Review the video inspection of R street residency for the "Fujitsu" printer per counsel in support on Motion for Fraud on Court; review motion for fraud on court	2.0	580.00
06/22/10	Sanford M. Saunders, Jr.	Review and revise motion to decertify and motion for fraud on the court; consult with K. Horky and J. McManus re: same; consult with N. [Timofti] re: same	2.9	1,812.50
06/22/10	Barry A. Dotson	Receive and work with third party documents produced by DNSmadeeasy as produced by plaintiff per 3rd party subpoena	0.4	82.00
06/23/10	John L. McManus	Work on finalizing motion to dismiss for fraud on the court	0.6	270.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
06/23/10	Kenneth A. Horky	Teleconference with John McManus; various communications re: motion for sanctions, motion to dismiss and exhibits, and pending discovery issues	0.8	368.00
06/24/10	Barry A. Dotson	Work with exhibits to motion to dismiss for fraud on the court in preparation for filing	2.1	430.50
06/28/10	Kenneth A. Horky	Followup on declaration in support of motion to dismiss for fraud on court; communications re: same and work on preparation of discovery for BSI internal communications on preparation of subpoenas; numerous communications with cocounsel re: aspects of same	0.5	230.00
06/29/10	Nicoleta Timofti	Email correspondence with counsel on Motion to Dismiss for Fraud on Court	0.5	145.00
06/29/10	Sanford M. Saunders, Jr.	Consult with N. [Timofti] re: [opposition to sanctions motion] and fraud on court filing	1.3	812.50
06/30/10	Kenneth A. Horky	Review correspondence to opposing counsel; communications with Nicoleta [Timofti] re: finalizing Saunders declaration for motion to dismiss for fraud on court	0.1	46.00
07/01/10	Nicoleta Timofti	Draft Saunders declaration in support of Motion to Dismiss for Fraud on Court; confer with S. Saunders on same	3.7	1,073.00
07/01/10	Sanford M. Saunders, Jr.	Emails with K. Horky and J. McManus re: motion to dismiss for fraud on the court and research BSI "threats" during settlement discussions; consult with N. [Timofti] re: same	1.7	1,062.50
07/01/10	Barry A. Dotson	Continue to assist with collection of facts for citations in draft motions	0.8	164.00
07/02/10	Nicoleta Timofti	Revise and edit Saunders Declaration in support of Motion to Dismiss for Fraud on Court; email correspondence with counsel on same; revise and edit the Memorandum in Support of Motion; draft Motion to Dismiss per counsel	3.0	870.00
07/02/10	Sanford M. Saunders, Jr.	Revise SMS declaration and consult N. [Timofti] re revised motion to dismiss for fraud on the court	1.5	937.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/02/10	Kenneth A. Horky	Continue working on memorandum of law in support of motion to dismiss for fraud on court; Saunders declaration; various and multiple communications re: same and ancillary filings	0.8	368.00
07/03/10	Kenneth A. Horky	Review draft motion to dismiss for fraud on court; respond with comments; multiple further communications re: presumptive deadline for filing motion and related matters	0.4	184.00
07/06/10	Nicoleta Timofti	Finalize and edit the Motion to Dismiss for Fraud on Court and Memorandum in Support, and Saunders Declaration; email communication with counsel on same	2.8	812.00
07/06/10	Sanford M. Saunders, Jr.	Revise SMS declaration and edit motion to dismiss; consult with N. [Timofti] re: same; email with K. Horky re: same	2.4	1,500.00
07/06/10	Barry A. Dotson	Research files for draft motion to dismiss for fraud on the court	2.5	512.50
07/06/10	Kenneth A. Horky	Review edits to motion to dismiss for fraud on court; work on/communications re: final arrangements for filing, form of exhibits, content of declaration and related matters for finalizing filing of motion to dismiss for fraud on court and memorandum of law in support of same; review final version with exhibits; work on issues re: which items should be filed under seal; communications re: same; circulate as-filed version to clients; subsequent communications with clients re: same	2.2	1,012.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/07/10	Nicoleta Timofti	Draft fifth document request to BSI to seek copies of document related to bogus subpoenas; email correspondence with counsel on same; conference call with A. Rothman, counsel for Connexus on Motion to Intervene to gain full access to WAUSA's Summary Judgment materials and Verierable email to Steptoe requesting confirmation that they provided copies of all subpoenas (as a result of WAUSA's filing Motion to Dismiss for Fraud on Court); email correspondence to client and counsel on same	1.9	551.00
07/07/10	Sanford M. Saunders, Jr.	Review and edit Opposition to Motion to Dismiss; review and consult with N.[Timofti] re draft document requests re fraud on the court	3.2	2,000.00
07/07/10	Kenneth A. Horky	Work on discovery re: issues raised in motion to dismiss for fraud on court	0.4	184.00
07/09/10	Jozef S. Przygodzki	Prepare Exhibits for Motion to Dismiss. Prepare redacted versions of Motion to Dismiss. File and serve Motion to Dismiss. Draft letter to clerk of the court regarding courtesy copy required by rule. Prepare clerk's copies	1.6	352.00
07/09/10	Kenneth A. Horky	Begin working on 5th request for production on fraud on court issues	1.3	598.00
07/12/10	Nicoleta Timofti	Draft the list of upcoming deadlines and briefs to be drafted in preparation for the internal phone call with S. Saunders, K. Horky and J. McManus; calendar same; participate at the internal conference call with counsel on the next steps and the Fifth Request for Production of Documents to BSI; start research on potential crimes; review research on abuse of process	6.0	1,740.00
07/12/10	Sanford M. Saunders, Jr.	Conference call with K. Horky, J. McManus and N. [Timofti] re: strategy and substantive issues related to outstanding motions and discovery issues; consult with N. [Timofti] re: document requests re: fraud on the court	1.9	1,187.50

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07/12/10	Kenneth A. Horky	Lengthy strategy call with cocounsel re: next steps on prosecuting fraud on court motion; subsequent conference with John McManus on implementation of various initiatives; extensive work drafting 5th request for production of documents on circumstances, persons involved in commission of fraud on court	3.7	1,702.00
07/13/10	Nicoleta Timofti	Revise and edit the Fifth Request for Document Request to BSI; confer with S. Saunders on same; conference call with K. Horky, J. McManus and S. Saunders on same; serve same on S. Ring and M. Rothman; review research on expedited discovery; start working on motion for same	5.0	1,450.00
07/13/10	Sanford M. Saunders, Jr.	Review and revise 5th set of document requests; consult with N. [Timofti] re same; conference call and emails with K Horky, J McManus and N [Timofti] re same and strategy	3.2	2,000.00
07/13/10	Kenneth A. Horky	Review edits to draft 5th request for production; confer with John McManus re: expanding scope of computer materials requested; review further revised version and edit same; work on revised version of 5th request for production of documents; review memo on research issues; conference call with cocounsel re: 5th request revisions and related strategy; work on further editing same, finalize and serve 5th request for production; outline next steps with cocounsel to bring relevant issues before court on expedited basis, schedule appointment with associate to discuss research issues for hearing to be requested before magistrate; circulate 5th request for production to clients, and communications re: same and related matters	5.1	2,346.00

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07/13/10	John L. McManus	Began research re: abuse of process issue; work on edits and markup to the fifth request for production of documents; work on reply to cross-motion; work on issues relating to motion to dismiss and expedited discovery issues	1.0	450.00
07/14/10	Jozef S. Przygodzki	Legal research regarding fraud on the court and expedited discovery	0.9	198.00
07/14/10	Nicoleta Timofti	Research, draft and review Motion to Limited Expedited Discovery and Memorandum in Support of same; confer with S. Saunders and counsel on same; revise and edit same per J. McManus and K. Horky; review and comment the letter to the Magistrate Judge on Motion for Expedited Discovery and the draft plan of issues to be discussed with S. Ring in anticipation of filing the letter with the Court	8.0	2,320.00
07/14/10	Sanford M. Saunders, Jr.	Review and finalize motion for expedited discovery; email and telephone conference with K. Horky and J. McManus re: same; consult with N. [Timofti] re: same	2.8	1,750.00
07/14/10	Kenneth A. Horky	Review confidentiality order and analysis of its provisions; prepare for meeting on crime/fraud research issues; work on issues for timing of deposition notice to Rothman; work on Rule 11 analysis issues; meeting with John McManus and Patricia Casey re: crime/fraud exception research issues; review and edit letter to Magistrate Judge Day requesting hearing; review and edit evidence preservation demand; teleconference with Nicoleta [Timofti]; confer with John McManus; teleconference with John McManus and Dale Baker; teleconference with Sandy Saunders and John McManus; work on motion for limited expedited discovery; work on short form motion for expedited discovery; work on memorandum o flaw in support of motion to expedite discovery; various comment	7.5	3,450.00

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07/14/10	Justin Angelo	Research issue re: scope of attorney-client and work product privilege concerning communications between attorneys in different actions	3.9	1,287.00
07/14/10	Barry A. Dotson	Supplement eRoom with WAUSA Fifth Request for Documents; review communications regarding opposing counsel; prepare notice and subpoena for deposition of opposing counsel	1.2	246.00
07/14/10	Patricia M. Casey	Research re: the Hobbs Act	8.4	1,932.00
07/14/10	John L. McManus	Work on edits to Motion for Limited Expedited Discovery; work on edits to Memorandum of Law in Support of Motion for Limited Expedited Discovery; Meeting with associate and co-counsel re: research on crime-fraud exception	1.5	675.00
07/15/10	Nicoleta Timofiti	Edit the memorandum in support of Motion for Limited Expedited Discovery per comments from K. Horky; draft proposed order granting Motion for Expedited discovery and the Local Rule 104(7) certificate in support of same; review production of documents by BSI allegedly responsive to Request 10 (FBI and Federal Investigations of WAUSA) and email counsel results of same; confer with S. Saunders, J. McManus and K. Horky on the conference call with S. Ring and the filing of Motion for Expedited Discovery; continue reviewing elements of potential crimes	7.5	2,175.00
07/15/10	Sanford M. Saunders, Jr.	Finalize Motion for expedited discovery; emails with BSI counsel re: same ;and discovery issues (BSI request to redact Rothman "big check" comment); telephone conference and email K. Horky and J. McManus re: same; consult with N. [Timofiti] re: letter to Magistrate Day re: hearing on request for expedited discovery	3.9	2,437.50

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07/15/10	Kenneth A. Horky	Work on order on motion for expedited discovery; teleconference with all members of working group re: discussion with opposing counsel and strategy concerning motion for expedited discovery and related matters	1.3	598.00
07/15/10	Justin Angelo	Completed research re: whether communications from BSI's attorneys in two lawsuits are subject to work product and attorney-client privilege, and drafted outline summarizing findings	2.5	825.00
07/15/10	Patricia M. Casey	Research re: Mail & Wire Fraud; compile and summarize research	7.6	1,748.00
07/15/10	John L. McManus	Work on multiple phone calls with co-counsel and emails re: filing of Motion for Expedited Discovery	2.0	900.00
07/16/10	Nicoleta Timofiti	Revise and Motion for Expedited Discovery, memorandum in support and proposed order; confer with counsel on same; edit the Letter to Magistrate Judge Day requesting a hearing; coordinate filing of Motion and Letter with the Court; review the preservation letter to Ring and Rothman; continue research the elements of the mail/wire fraud and false statements; draft memorandum to counsel on same	6.4	1,856.00
07/16/10	Sanford M. Saunders, Jr.	Finalize request for expedited consideration; multiple telephone conferences and emails re: fraud on the court and discovery issues	2.0	1,250.00
07/16/10	Patricia M. Casey	Research re: the Hobbs Act and Wire fraud; summarize and compile research; meeting to discuss research	3.5	805.00
07/16/10	Justin Angelo	Research choice of law issue for abuse of process claims	2.7	891.00
07/16/10	John L. McManus	Continued work on issues relating to motion for expedited relief and opposition and request for production of documents	5.9	2,655.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/16/10	Kenneth A. Horky	Review Ring correspondence; work on upcoming filings; work on finalizing evidence preservation letters; work on finalizing and preparing for filing package for Magistrate Judge Day on request for expedited discovery; several teleconferences during day; numerous email communications; lengthy discussion re: results of research on crime fraud exception to attorney client privilege; review filings; circulate to client	3.7	1,702.00
07/19/10	Nicoleta Timofti	Finish drafting memorandum on element of false statement and mail/wire fraud crimes; conference call with Judge Day's clerk re letter requesting a hearing on Motion for Expedited Discovery; email counsel on same	6.0	1,740.00
07/19/10	Sanford M. Saunders, Jr.	Email with N. [Timofti] re: elements to criminal matters	0.8	500.00
07/19/10	Kenneth A. Horky	Work on strategy issues re: recent filings and related; followup communications; work on fraud on court issues	0.4	184.00
07/20/10	Patricia M. Casey	Research re: the mail and wire fraud statutes interrelation and defense to both	2.3	529.00
07/20/10	John L. McManus	Work on issues relating to request for expedited hearing; work on issues relating to motion to dismiss for fraud on the court; discussion re: same	2.7	1,215.00
07/21/10	Nicoleta Timofti	Review BSI's response to Motion for Expedited Discovery; review the language cited therein from the alleged subpoenas and the subpoenas served on third parties	2.0	580.00
07/21/10	Sanford M. Saunders, Jr.	Review BSI Opposition to request for expedited discovery; review and edit draft response; telephone conference with K. Horky re: same; consult with N. [Timofti] re: same; emails with K. Horky re: Ralsky emails and materials produced by BSI	2.0	1,250.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/21/10	Kenneth A. Horky	Review response to request for hearing; draft reply to same and communications with cocounsel re: content of reply; email to Dale Baker on critical case issues; further work on content of reply; review underlying documents; compare to question as cited in memo in opposition cited by BSI; review Ralsky indictment; confer with cocounsel; further followup on evidence preservation issues; communications with Dale Baker; teleconference with Dale Baker and John McManus; other communications with cocounsel re: same issues	5.7	2,622.00
07/21/10	Patricia M. Casey	Communication re: results of research into mail fraud	0.1	23.00
07/21/10	Barry A. Dotson	Research and obtain court docket and indictment and sentencing memorandum from Michigan case against Ralsky; pull court filings relating to urgent telephonic hearing on collateral issue	1.5	307.50
07/21/10	John L. McManus	Receive and review of filing re: request for expedited discovery; draft response re: same; conferences with co-counsel re: same	4.1	1,845.00
07/22/10	Nicoleta Timofti	Revise and edit the letter to Magistrate Judge in response to BSI's opposition to expedited discovery	3.5	1,015.00
07/22/10	Sanford M. Saunders, Jr.	Consult with K. Horky and J. McManus re: Letter Reply re Expedited discovery	1.5	937.50
07/22/10	Kenneth A. Horky	All day activities involving recent and upcoming filings, including: review Sandy Saunders' comments to letter to Magistrate Judge Day; further revise and edit letter; followup communications; communications with Hugh Hackney re: criminal law issue; work on correspondence to court	3.4	1,564.00
07/22/10	Barry A. Dotson	Research language in plaintiff's third party subpoenas to confirm conclusions in letter to magistrate	1.4	287.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/22/10	Patricia M. Casey	Research re: the crime-fraud exception in Maryland; summarize and compile research; internal communication re: crime-fraud research	3.3	759.00
07/22/10	John L. McManus	Continued drafting and work on response re: motion for expedited discovery on Fifth Request for Production of Documents	1.3	585.00
07/23/10	Nicoleta Timofti	Revise and edit the emergency opposition to the extension of time motion filed by BSI to respond to Motion for Fraud on Court; draft email responses to BSI counsel; review the research results on elements of crimes	3.9	1,131.00
07/23/10	Kenneth A. Horky	Review various filings; work on opposition to motion for extension and work on draft order; teleconference with Homer Appleby and Rob Erie; work on finalizing opposition; continue working on crime/fraud analysis issues; confer with cocounsel; teleconference with Dale Baker; call to Hugh Hackney and subsequent discussion re: mail fraud/wire fraud issues; review materials; circulate pertinent materials to cocounsel, client; follow-up communications	7.1	3,266.00
07/23/10	John L. McManus	Telephone conference call with Hugh Hackney re: results of similar action relative to conduct in Motion to dismiss for fraud on the Court; download the decision, Appellate Briefs, and related articles; extensive discussion re: same	1.0	450.00
07/25/10	Kenneth A. Horky	Analysis of Hobbs Act and extortion research	3.6	1,656.00
07/27/10	Nicoleta Timofti	Email correspondence on BSI discovery issues and filing deadlines	0.9	261.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/27/10	Kenneth A. Horky	Extensive analysis of criminal caselaw, Holmes case, underlying government appellate brief; annotation exploring types of crimes implicated in preparation and submission of phony documents, and research memo on false statements claims, all to determine best crime/fraud exception arguments for attorney client privilege claims likely to be raised by BSI	2.9	1,334.00
07/28/10	Nicoleta Timofti	Confer with J. McManus and K. Horky on conference call hearing with Judge Day on expedited discovery; conference call with the clerk of the Court and S. Saunders on same; review research result in crime-fraud exception in preparation for the hearing on Expedited Discovery	2.9	841.00
07/28/10	Kenneth A. Horky	Series of conferences and teleconferences with cocounsel re: calling court re: pending emergency motion; continued review and analysis of criminal caselaw on crime/fraud exception; work on research issues preparatory to requested magistrate hearings; formulate additional research items for possible direct claims; several teleconferences with cocounsel; communications with client; review research results on honest services issues; numerous communications with client	6.3	2,898.00
07/28/10	Patricia M. Casey	Research re: the "honest services" provision of 18 USC 1346 and its application to the mail & wire fraud statute, specifically after the recent Supreme Court decisions	2.5	575.00
07/28/10	Barry A. Dotson	Research whether plaintiff filed bogus 3rd party subpoenas with court	1.0	205.00
07/28/10	Justin Angelo	Research re: tortious interference choice of law issue	2.1	693.00
07/29/10	Nicoleta Timofti	Review the research results on the crime-fraud exception research	1.6	464.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
07/29/10	Kenneth A. Horky	Review and analysis of results of research on ability to bring direct claim for defamation; review research on direct claim for abuse of process; analysis of legal research on standard for allowing in camera review of attorney/client privileged communications under crime/fraud exception to privilege; develop argument for use at hearing on same; confer with Bruce March; confer with/explain to cocounsel key argument from results of legal research and how to use caselaw to argue privilege log, crime/fraud exception at discovery hearing requested from magistrate; followup communications with working group; review memorandum on content, arguments to make in upcoming filings, and related communications	4.7	2,162.00
07/29/10	Justin Angelo	Research re: tortious interference choice of law issue	2.5	825.00
07/29/10	Patricia M. Casey	Research re: obstruction of justice	3.3	759.00
07/30/10	Nicoleta Timofti	Review BSI's opposition to Motion to Dismiss for Fraud on Court and email counsel comments on same	3.8	1,102.00
07/30/10	Kenneth A. Horky	Review memo on defamation/tortious interference issues; followup questions to Justin Angelo; deal with issues re: afternoon magistrate hearing on motion to expedite discovery; pull materials for use at hearing and otherwise work on preparations; communications with client; review chronology; identify key docs to read to Judge at hearing	2.2	1,012.00
07/30/10	Justin Angelo	Began research re: absolute privilege defense for tortious interference claims	0.5	165.00
07/30/10	Kenneth A. Horky	After-hours communications with John McManus re: nuances of day's hearing and steps going forward' communications with Nicoleta [Timofti] re: exhibits attached to BSI's opposition	0.2	92.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/01/10	Nicoleta Timofti	Review the opposition to motion to dismiss for fraud on Court; email counsel exhibit 16 cited by BSI's internal communication; email correspondence with counsel on same	1.0	290.00
08/02/10	Nicoleta Timofti	Review BSI's opposition to motion for expedited discovery and to dismiss for fraud on Court; confer with J. Richard on same; confer with K. Horky and J. McManus on same	1.2	348.00
08/02/10	Justin Angelo	Began research into California, Delaware, Maryland law re: applicability of litigation privilege to tortious interference claims	1.2	396.00
08/02/10	Patricia M. Casey	Research re: obstruction of justice, submission of false documents in the mail/wire fraud context and the creation of false court documents	3.0	690.00
08/02/10	Kenneth A. Horky	Review correspondence from opposing counsel; memorandum in opposition to motion to dismiss for fraud on court; review exhibits to same; further communications re: exhibits; numerous communications with cocounsel and clients	3.1	1,426.00
08/03/10	Nicoleta Timofti	Review and edit the preservation letters to be sent to BSI and its counsel re Fifth Request for Production of documents	0.9	261.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/03/10	Kenneth A. Horky	Review background information on Amanda Ornitz; review interim motion to seal exhibits to opposition to motion to dismiss for fraud on court; review response in opposition to motion to strike and attachments; review second supplement to reply memorandum; review supplement of cases not generally available per local rule 105.5; review consent motion for extension of time; calendar applicable dates; review supplemental submission of exhibits to reply memo, and numerous exhibits appended thereto including various declarations; continue studying Rothman's filings and supporting affidavits; confer with cocounsel re: sending out evidence preservation letters, preparing deposition notices for Rothman and Ornitz and related matters; lengthy teleconference with Dale Baker and Niuniu Ji re: need to issue subpoenas to each company subpoenaed by BSI to get complete copies of all materials Rothman claims not to have; subsequent calls and emails to cocounsel instructing them to prepare the subpoenas	7.1	3,266.00
08/03/10	Patricia M. Casey	Research re: false statement/misrepresentation that obstruct justice	3.2	736.00
08/03/10	Justin Angelo	Continue research under Maryland, California and Delaware law to scope of litigation privilege and potential exceptions for bringing tortious interference claim	1.8	594.00
08/03/10	John L. McManus	Final review of subpoenas and notices of taking depositions; work on circulating drafted subpoenas and notices of deposition for deponents; office conference with co-counsel on the ordering of the depositions	1.0	450.00
08/04/10	Nicoleta Timofiti	Conference call with K. Horky, J. McManus and S. Saunders on BSI discovery issues and due briefs; review and comment on notices of deposition and transmittal email to M. Rothman and S. Ring	1.5	435.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/04/10	Kenneth A. Horky	Review deposition notices; conference call with cocounsel re: various strategy and timing issues; work on subpoenas, notices of deposition and correspondence; review research results on crime/fraud issues; followup communications re: pending discovery	1.8	828.00
08/04/10	Justin Angelo	Completed research under Maryland, Delaware and California law re: exceptions to absolute privilege, and drafted outline summarizing research findings	2.0	660.00
08/04/10	Patricia M. Casey	Communication re: obstruction of justice, mail/wire fraud and submissions of false document research	0.2	46.00
08/04/10	Barry A. Dotson	Research home addresses for opposing counsel, Rothman, his wife Amy, and his assistant, Amanda L. Ornitz	0.7	143.50
08/04/10	John L. McManus	Work on conference call with co-counsel on three pending issues; work on subpoenas to opposing counsel and his assistant; instructions to paralegal re: addresses for subpoenas; review documents re: same; circulate documents re: addresses for deponents; receive and review of follow-up e-mail re: same; instructions to paralegal re: same; receive and review of response, and circulate same; circulate subpoenas and notices of taking depositions; work on telephone call with Dr. Neal Krawetz re: issues in the Affidavits in opposition to fraud on the court motion; telephone call with client re: pending matters; work on e-Mails to Dr. Neal Krawetz to get his opinion on Adobe issues; work on e-Mail to paralegal re: formatting subpoenas to customers subpoenaed by BSI; receive and review of e-mail transmitting notices of taking deposition and content thereof; work on markup and circulation of same of Opposition to Motion to Seal; work on further e-mails to expert	3.0	1,350.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/05/10	Nicoleta Timofti	Review notice of deposition per M. Rothman's request to take out the home address; email correspondence with counsel on same; edit preservation letter to include Ms. Ornitz' computer	1.7	493.00
08/05/10	Kenneth A. Horky	Continue exploring possible direct claims; review followup answers to further research questions; email to associate re: further issue to address; work on other subpoena-related issues; work on deposition preparation issues and on pending filings; confer with cocounsel; conference call with Neal Krawetz and John McManus; review revised evidence preservation letter	3.6	1,656.00
08/05/10	Barry A. Dotson	Research files for preservation letter to plaintiff	0.2	41.00
08/06/10	Nicoleta Timofti	Finalize and serve preservation letters on BSI and its counsel; review additional set of third party subpoenas served by M. Rothman	2.3	667.00
08/06/10	Kenneth A. Horky	Status memo to client on recent filings and developments; continue working on direct claim analysis	0.7	322.00
08/06/10	John L. McManus	Brief review of two letters on discovery; brief review of revised preservation letter	0.1	45.00
08/06/10	Barry A. Dotson	Research discovery and prepare reference list of 23 subpoenas referenced by opposing counsel; research corporate/service addresses for subpoenas; begin preparing 23 draft subpoenas to client customers (which were subpoenaed by BSI) in anticipation of deposing opposing counsel	5.0	1,025.00
08/09/10	Jozef S. Przygodzki	Legal research regarding Computer Fraud and Abuse Act claim	0.6	132.00
08/09/10	Nicoleta Timofti	Review revised notices of subpoenas and subpoenas served by M. Rothman; email correspondence with counsel on same; review the cases on independent causes of actions against BSI for violating violation of the Computer Fraud and Abuse Act, 18 USC sec. 1030(a)(2)(c)(g)	1.4	406.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/09/10	Kenneth A. Horky	Review and calendar new deadlines; communications with client; review research outline; confer with Bruce March; planning with cocounsel on strategy issues re: fee application and matters related to motion to strike pleadings for fraud on the court	1.7	782.00
08/09/10	John L. McManus	Conference meeting with co-counsel re: strategy on depositions, subpoenas, etc.; work on correspondence via e-mail re: depositions; editing of subpoenas to non-parties who were the subject of the fraud on the Court; work on review and analysis of Response to Motion to Strike; work on review of attachments; work on review of attachments to Reply Memorandum; e-mail from client re: new subpoena; e-mail re: reply brief on motion to strike; work on new Subpoenas to parties affected by Motion to Dismiss for Fraud on the Court	4.0	1,800.00
08/09/10	Barry A. Dotson	Begin review of two versions of notice of production from opposing counsel and 15 third party subpoenas	0.6	123.00
08/10/10	Nicoleta Timofti	Review and comments the letter to BSI re new subpoenas	0.9	261.00
08/10/10	Justin Angelo	Review Plaintiff's Response and Memorandum of Law in Opposition to WAUSA's Motion to Dismiss for Fraud on the Court. Research re: standard for sanctions for "vexatious litigation" under 28 USC 1927	2.2	726.00
08/10/10	John L. McManus	Work on drafting of three letters to BSI-- one regarding Declaration, one regarding Fourth Request for Production, and one regarding new subpoenas; work on examination of new subpoenas; work on separate notice of supplemental authority re: discovery violations; work on edits to multiple subpoenas to non-parties; work on telephone call relating to expert witnesses presentation; work on arrangements for expert witness presentation; work on issues relating to issuance of subpoenas	2.5	1,125.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/11/10	Kenneth A. Horky	Further work on notice of supplemental authority and related correspondence; review final version of further correspondence to Ring/Rothman; communications to client re: same and re: latest case events	0.8	368.00
08/11/10	Justin Angelo	Continue analysis of defamation argument raised by BSI in response to WAUSA's motion to dismiss for fraud on court. Research re: sanctions under inherent authority of Court pursuant to BSI's response to dismiss for fraud on the Court	1.1	363.00
08/11/10	John L. McManus	Work on review of the new subpoena produced in electronic copy of the 15 non-parties and exchange e-mail correspondence re: same	0.5	225.00
08/12/10	Nicoleta Timofiti	Meeting with the expert, Dr. Krawetz on BSI's opposition to WAUSA's motion to dismiss for fraud on Court; review Dr. Krawetz' declaration in support of Reply in support of Motion to Dismiss for fraud on Court	3.0	870.00
08/12/10	Kenneth A. Horky	Teleconference with Dr. Krawetz, cocounsel re: findings and issues re: affidavits of Rothman and Ornitz	2.0	920.00
08/12/10	John L. McManus	Work on subpoena issuance to non-parties; preparation for, pre-call with, and work on evening webinar and conference call with expert regarding his comments on submission to Motion to Dismiss for Fraud on the Court; work on drafting, circulation, and sending of proposed e-mail concerning consent to opposing counsel's request for extension of time	4.5	2,025.00
08/12/10	Barry A. Dotson	Arrange for contact person in Wilmington office to receive documents to be produced in response to yesterday's third party subpoenas; prepare additional supplements to subpoena chart; investigate current address for Body Sculpture regarding third party subpoena	0.8	164.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/13/10	Nicoleta Timofti	Review and comment on correspondence to BSI's counsel on the additional subpoenas issues; review BSI's response to WAUSA's fifth request for production of documents; email correspondence with K. Horky and J. McManus on same	2.5	725.00
08/13/10	John L. McManus	review correspondence from resident agent re: subpoenas to Consumer.info and Experian; return telephone call from client re: status; review response to fifth request for production; work on receipt and review of letter from opposing counsel refusing to withdraw subpoenas; work on drafting and circulation of proposed response re: same; receive and review of deposition outline of Ornitz and of Rothman	2.0	900.00
08/13/10	Barry A. Dotson	Research corporate records and revise subpoenas for Intersections, Experian/ConsumerInfo, Solar Electric Light Company, MetroNet Internet Services, and MegaPath; arrange production sites, and prepare notices of production	2.3	471.50
08/16/10	Nicoleta Timofti	Draft motion for extension of time to file WAUSA's Reply in Support of its Motion to Dismiss for Fraud on Court; edit and revise per comments from K. Horky and J. McManus; organize exhibits in support of same	3.7	1,073.00
08/16/10	Kenneth A. Horky	Review response to fifth request for production; edit motion for extension of time, edit notice of supplemental authority; followup communications; confer with cocounsel re: strategy issues; further communications with client	3.0	1,380.00
08/16/10	John L. McManus	Work on markup to the Motion for Extension of Time; work on e-mail to opposing counsel re: their e-mail of Friday re: withdrawal of subpoenas; work on e-mail to opposing counsel re: extension of time; revise co-counsel's comments to the Motion for Extension of Time	2.5	1,125.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/16/10	Justin Angelo	Research litigation privilege cases referenced by BSI in its Response to Motion to Dismiss for fraud on the court and drafted section to rebut claim that defamatory statements in subpoena fall within litigation privilege	2.6	858.00
08/16/10	Barry A. Dotson	Receive and upload plaintiff's response to 5th request for production	0.2	41.00
08/17/10	Kenneth A. Horky	Review correspondence from opposing counsel; teleconference with Dale Baker; continue working on third party subpoena issues; teleconferences with clients re: same; strategy call with Niuniu Ji and Dale Baker; follow-up conference with cocounsel	2.5	1,150.00
08/18/10	Nicoleta Timofti	Review BSI's opposition to Motion for Extension of time to file Reply in support of Motion to Dismiss for Fraud on Court; edit the reply per counsel's comments and insertions	2.5	725.00
08/18/10	Kenneth A. Horky	Communications with client; work on evidence preservation demand issues	0.1	46.00
08/18/10	John L. McManus	Review of message concerning non-service on Body Sculpture--a party served by BSI; telephone call with expert re: origin of circles on the subpoenas	0.5	225.00
08/19/10	Nicoleta Timofti	Review and comment on LR 104 certificate filed by Rothman and Ornitz re deposition notices; review opposing counsel's email correspondence re same	2.6	754.00
08/19/10	Kenneth A. Horky	Review response to motion for extension of time to prepare reply to opposition to motion to dismiss for fraud on the court; followup communications; status memo to clients; communications with Sandy Saunders re: Ring correspondence	0.4	184.00
08/19/10	Justin Angelo	Research cases re: quashing subpoenas based on false statements and drafted motion to quash fifteen (15) non-party subpoenas served by BSI	5.3	1,749.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/20/10	Kenneth A. Horky	Review BSI's motion to quash deposition subpoenas to Ornitz, Rothman; review Rothman's and Ornitz's motion to quash subpoenas for deposition	0.3	138.00
08/20/10	Barry A. Dotson	Research files for evidence hold communications from opposing counsel	0.5	102.50
08/20/10	John L. McManus	Receive and review of e-mails relating to Tiggee issues and recent filings of Motion to Quash/Motion for Protective Order	0.5	225.00
08/20/10	Justin Angelo	Follow up research issue re: absolute privilege under Maryland law	0.4	132.00
08/23/10	Nicoleta Timofti	Review and comment on draft motion to quash BSI's non-party subpoenas and LR 104 certificate; email correspondence with counsel on same; review and comment on the Reply in support of Motion for extension of time	6.4	1,856.00
08/23/10	Jozef S. Przygodzki	Draft cover letter for transmission of courtesy copy of Reply to court. Prepare and transmit courtesy copies of Reply in Support of Motion to Dismiss	0.3	66.00
08/23/10	Kenneth A. Horky	Review recent filings; work on motion to quash; review client subpoena returns; further work on motion to quash, and on finalizing same	4.6	2,116.00
08/23/10	Justin Angelo	Completed comparison of BSI's case cites in its motion to quash with WAUSA's motion to quash	0.2	66.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/23/10	John L. McManus	Review of existing version of motion to quash; all-day work on 23-page motion to quash; review and incorporate in edits from co-counsel; multiple telephone conferences with expert witness and review of data regarding additions to the motion respecting e-mail addresses; work on noon meeting on the issues on the motion to quash; work on research on alleged Ralsky connection and draft sections conclusively proving absence of link; begin work on memorandum of law in support of motion for extension of time to file Reply Memorandum in Support of Motion to Dismiss for Fraud on The Court; draft local rule 104 certificate; work on lengthy communication re: section on motivation.	9.0	4,050.00
08/23/10	Barry A. Dotson	Research Wagner affidavits to identify references to Ralsky	1.5	307.50
08/24/10	Nicoleta Timofti	Confer with J. McManus on the "to do list"; review edits to the Reply in support of Motion for Extension of time; conference call with K. Horky, S. Saunders and J. McManus on strategy in defending the case and up-coming deadlines	3.9	1,131.00
08/24/10	Kenneth A. Horky	Read as filed motion to quash, local rule 104 certificate; calendar upcoming due dates; communications with cocounsel; work on response to opposition to motion for extension of time and related matters; status update to clients; teleconference with Jeff Richard; edit reply to memo in opposition to motion for extension of time to file reply on motion to strike pleadings for fraud on court; lengthy strategy call with cocounsel; review and further extensively edit reply to memo in opposition to motion for extension of time	3.9	1,794.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/24/10	John L. McManus	Work on To Do List for items to be covered with co-counsel and division of work; work on conference call with all co-counsel on the issues; work on Reply Memorandum in Support of Motion for Extension of Time to File Reply Memorandum in Support of Motion to Dismiss; work on call from client re: status; circulate Reply Memorandum to the Team; receive and review of edits to the Memorandum; telephone call with co-counsel re: idea for edit to the Reply Memorandum	5.0	2,250.00
08/25/10	Nicoleta Timofti	Review BSI's Reply in support of its Motion to file under seal opposition and email counsel same; review S. Saunders' edits on the Reply in support of Motion for extension of time to file the Reply to Motion to Dismiss for fraud on Court	1.0	290.00
08/25/10	Kenneth A. Horky	Review reply to response to sealing motion; review caselaw on litigation privileges pertinent to possible direct claims against BSI, others; further work on reply and related matters; further extensive final editing of reply; multiple communications and teleconferences with cocounsel re: same	1.2	552.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/25/10	John L. McManus	Work extensively on Reply Memorandum in Support of Motion for Extension of Time to File Reply Memorandum in Support of Motion to Dismiss For Fraud Upon The Court; work on conference with co-counsel; work on phone call to client re: insert into the Reply Memorandum; work on working with Rhapsody, LLC re: receipt of the subpoena; review of e-mail re: the objections by Kraft containing a reference to there being two versions of the Subpoena and whether there was an issue on that; forward request to co-counsel; receive and review of response re: absence of counsel for Kraft; review of new filing by opposing counsel and commentary re: same; receive and review of letter and commentary by co-counsel on letter relating to Ralsky; receive and review of edits from Nicoleta Burlacu; further e-mails/phone call to client re: exhibits to brief.	4.0	1,800.00
08/26/10	Nicoleta Timofti	Review edits on the Reply in support of motion for extension of time; coordinate filing of same; confer with counsel on the suggested response to opposing counsel's correspondence	2.6	754.00
08/26/10	Sanford M. Saunders, Jr.	Review and revised reply; emails and telephone conversation with Corky and JMcManus	0.9	562.50
08/26/10	Kenneth A. Horky	Review correspondence from Ring; draft proposed response; series of emails to clients explaining recent events; analysis of Ornitz, Rothman affidavits; review question outlines; work on notice of supplemental authority; hear report on results of research on ability to take opposing counsel's deposition; extensive calls, editing to finalize reply brief and charts contained in same, and file same; circulate to client with explanatory email; numerous followup communications	7.1	3,266.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/26/10	John L. McManus	work on email to co-counsel re: project on motion to quash, motion for protective order; work on emails to co-counsel re: final edits for the Reply Memorandum in Support of Motion for Extension of Time to File Reply Memorandum in Support of Motion to Dismiss for Fraud Upon the Court; work on review of e-mail re: BSI requests for production for purposes of incorporation into the letter to the Court; work on incorporation into the Reply Memorandum on final chart on the issue of the Kraft Subpoena and documents that were not produced; work on e-mail to client re: same.	4.0	1,800.00
08/26/10	Justin Angelo	Review Michael Rothman's Motion for Protective Order and to Quash Depositions; research re: circumstances where courts allow depositions of opposing counsel in pending \case; follow up research on crime fraud exception to attorney client privilege; began drafting legal argument in response to motion for protective order	4.1	1,353.00
08/26/10	Barry A. Dotson	Receive and work with additional service returns for 3rd party document subpoenas; upload to FileSite and eRoom; prepare supplements to subpoena tracking chart; receive and work with subpoena response from Kraft Foods Global, Bates stamp documents, and upload to FileSite and eRoom; prepare request for copies to BSI of third party subpoenas and documents produced in response	1.2	246.00
08/27/10	Justin Angelo	Drafted legal argument for memorandum in opposition to BSI's motion for protective order / motion to quash depositions	2.7	891.00
08/27/10	Patricia M. Casey	Review research re: civil contempt	0.2	46.00
08/27/10	Barry A. Dotson	Pull motion, response, and all exhibits regarding fraud on the court and upload to eRoom	0.4	82.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/27/10	John L. McManus	Extensive work on letter to the Court re: ESI issues pertaining to the Fifth Request for Production of Documents; work on preparation of materials for upcoming meeting with clients re: issues; work on edits to request for copies; receive and review of outline of cases for the motion to quash/motion for protective order on the issue of attorney depositions; work on email to co-counsel outlining the particulars of a research project on the motion for civil contempt; receive and review of new listing of depositions; work on e-mail to co-counsel re: same	2.0	900.00
08/28/10	John L. McManus	Work on letter to Court re: ESI issues on Fifth Request for Production; work on ESI research and privilege; review and incorporate ESI Agreement	3.0	1,350.00
08/29/10	John L. McManus	Continued work on letter to Court re: ESI Issues on Fifth Request for Production of Documents; work on review of research on crime-fraud exception; work on review of Motion to Quash/Motion for Protective Order; work on research on metadata; work on research on depositions of opposing counsel/review of existing research; work on agenda for upcoming client meeting; continued preparation for meeting; assemble materials for discussion at meeting.	4.0	1,800.00
08/30/10	Nicoleta Timofti	Conference call with counsel and the client on the response to Opposition to Motion to Dismiss for fraud on Court and discovery matters	2.0	580.00
08/30/10	Patricia M. Casey	Communication re: libel per se research	0.2	46.00
08/31/10	Sanford M. Saunders, Jr.	Review BSI correspondence and draft response; preparation for call with BSI counsel and conference call with K. Horky and J. McManus re: same	2.0	1,250.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
08/31/10	Nicoleta Timofti	Review multiple emails from S. Ring on discovery issues; confer with K. Horky, J. McManus and S. Saunders on the topics to be discussed at the meet and confer with BSI's counsel; review the draft letter to the Judge Day re ESI and the response to Fifth request for production	4.0	1,160.00
08/31/10	Kenneth A. Horky	Review multiple correspondence; further work on multiple issues covered at meeting with clients, cocounsel; extended discussion re: proper strategy to pursue with motion to dismiss for fraud on court; review writeup for precall preparation with Ring; work on meet and confer call preparation	1.5	690.00
08/31/10	John L. McManus	Work on lengthy meeting on strategy issues re: Motion to Dismiss for Fraud on the Court and other issues; Work on 10-page outline of issues for upcoming call; work on telephone conference call with co-counsel re: upcoming call; work on edits to letter to Judge; circulate edits to letter to the court	4.0	1,800.00
08/31/10	Patricia M. Casey	Research re: civil contempt in Maryland federal court and the Fourth District Court of Appeals	2.5	575.00
09/01/10	Nicoleta Timofti	Meet and Confer with BSI's counsel; draft emails and notes on same; conference call with S. Sanders, K. Horky and J. McManus on the meet and confer and next defense steps; revise the letter to Judge Day on ESI and hearing on the Fifth document request; ;review and comment on the follow up email on same by S. Ring	3.9	1,131.00
09/01/10	Sanford M. Saunders, Jr.	Meet and confer with BSI counsel re: discovery; telephone conference with Corky, JMcManus and N[Timofti] re: same	2.0	1,250.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/01/10	Kenneth A. Horky	Extensive work, and several rewrites, on letter to Court on ESI correspondence and request for expedited hearing on 5th request for production; review correspondence from Ring; review series of subpoenas on motion to dismiss issues; review memo on contempt of court research issues; review underlying caselaw on contempt of court research; lengthy conference call with Sandy Saunders, Nicoleta [Timofti], John McManus	8.6	3,956.00
09/01/10	Patricia M. Casey	Research re: civil contempt & the meaning of "harm"	3.7	851.00
09/01/10	Barry A. Dotson	Receive and work with new third party subpoenas and notices of production; prepare supplements to subpoena tracking chart; upload subpoenas and notices to eRoom and FileSite; arrange for service of subpoenas on DirecTV, Citibank Mastercard, and America Online	1.7	348.50
09/01/10	John L. McManus	Work on discussion of strategy; extensive work on letter to Court re: ESI; Evening conference call with co-counsel re: status; work on follow-up discussion with co-counsel	4.5	2,025.00
09/02/10	Sanford M. Saunders, Jr.	Telephone conference with Corky and JMcManus re: discovery meet and confer and responding to BSI counsel's summary and letter regarding ESI/5th requests for discovery letter	1.6	1,000.00
09/02/10	Patricia M. Casey	Research re: libel per se in Maryland	1.5	345.00
09/02/10	Barry A. Dotson	Research Tiggee LLC dba DNS Made Easy and prepare Notice and Subpoena for deposition	0.5	102.50
09/02/10	John L. McManus	Telephone conference with co-counsel re: pending letter to Court and re: pending Press Release and impact on litigation; second follow-up call re: same	0.3	135.00
09/03/10	Nicoleta Timofti	Review and edit the letter to Magistrate Judge Day on ESI discovery and request for hearing on the Fifth document request on the motion to Dismiss for Fraud on Court facts	2.7	783.00

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Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/03/10	Sanford M. Saunders, Jr.	Revise and finalize ESI/5th request for production letter; consult with N[Timofti] re: same; email Corky re: same; email BSI counsel re: clarification of summary of discovery meet and confer	2.3	1,437.50
09/07/10	Nicoleta Timofti	Review the Opposition to Motion for Protective Order filed by BSI on fraud on court discovery; revise the letter on privilege log on fifth request for production	2.4	696.00
09/07/10	Sanford M. Saunders, Jr.	Emails with BSI counsel re: discovery conference call; emails with Corky and JMcManus re: briefs and consult with N[Timofti] re: edits; review privilege log	2.0	1,250.00
09/07/10	Kenneth A. Horky	Review privilege log, followup communications re: same; review further correspondence from Ring, and response to same; followup communications; review as-filed version of letter to Court, and circulate same; analysis of what is revealed by privilege log; confer with cocounsel re: same; memo to cocounsel, clients re: same; teleconference with Home Appleby and John McManus; work on, and extensive editing of, memorandum of law in opposition to motion for protective order; meet with cocounsel to work on incorporating what was revealed by privilege log, and work on finalizing memo for filing	5.9	2,714.00
09/07/10	Barry A. Dotson	Continue reviewing production documents to identify documents to be placed on privilege log; review court filings regarding DNS Made Easy and download relevant filings regarding discovery issues	2.5	512.50
09/07/10	Patricia M. Casey	Research re: accusation of a crime as libel per se	1.0	230.00

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Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/07/10	John L. McManus	Work on drafting of Opposition to Motion of Non-Parties Michael S. Rothman and Amanda Ornitz's Motion for Protective Order and To Quash Deposition Subpoenas; Work on research on attorney-client/work product privilege areas; Work on drafting of Opposition to Plaintiff Beyond Systems, Inc.'s Motion for Protective Order and To Quash Deposition Subpoenas; work on Notice of Filing Materials Under Seal; work on Motion to Seal; work on Exhibits to the Oppositions; work on two telephone calls with client re: Exhibits to Opposition; work on circulation of brief; work on review and incorporation of edits of co-counsel; extensive discussion of brief with co-counsel; work on circulation of modified version of brief; work on brief filing.	13.5	6,075.00
09/08/10	Nicoleta Timofti	Revise and edit multiple times the letter on privilege log; conference call with S. Saunders, J. McManus and K. Horky on same; review Judge's letter on World Avenue's Rule 104 Certificate; confer with counsel on same; revise the timeline of the meet and confer with counsel on DE 212 Order; confer with counsel on same; review pervious communication with opposing counsel on same.	4.6	1,334.00
09/08/10	Sanford M. Saunders, Jr.	Conference call with BSI counsel re discovery; telephone conversation and email with Corky re: same and expediting same and response to BSI letter opposition to expedited discovery	2.0	1,250.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/08/10	Kenneth A. Horky	Teleconference with cocounsel; review as filed version of memorandum of law; communications with client re: same; work on letter to court re: privilege log; teleconferences with Nicoleta [Timofti]; further work on letter re: privilege log deficiencies; review timeline; other work on pending filings; extended conference call with cocounsel re: multiple discovery issues; subsequently confer with John McManus re: various strategy issues	5.0	2,300.00
09/08/10	Patricia M. Casey	Research re: libel per se and whether accusations of a crime qualify	0.8	184.00
09/08/10	John L. McManus	Work on review of Court Order re: Certificate on Motion to Compel respecting DE 212; prepare comprehensive timeline of events relating to DE 212; work on transmission of same; receive and review of letter draft respecting privilege log; work on review of Local Rule provisions; Work on subpoenas to StyleMyHouse (fraudulent subpoena issue); work on edits to letter on Local Rule Privilege Log issue; telephone conference call with co-counsel	6.5	2,925.00
09/09/10	Nicoleta Timofti	Conference call with S. Ring on the discovery issues; follow up call with counsel on same; revise and edit the privilege log letter to the opposing counsel; revise and edit the Declaration of S. Saunders on meet and confer; revise, edit and file the letter on DE 407 regarding a dispute over discovery of Electronically Stored Information requested in WAUSA's Fifth Request for Production of Documents	5.4	1,566.00
09/09/10	Sanford M. Saunders, Jr.	Review BSI filing re; discovery; email and telephone conference with Corky and JMcManus and N[Timofti] re: response; review and revise draft declaration	2.0	1,250.00

Beyond Systems, Inc. v. World Avenue USA, LLC
Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/09/10	Kenneth A. Horky	Review attorney Ring's ESI correspondence to Court; outline proposed response; review motion for leave to file surreply; review and analysis of surreply, and evaluate whether to move to strike; memo to cocounsel on points for same; followup communications re: Ring's correspondence to court, rebuttal; work on rebuttal and on Saunders declaration in support of same; review defamation research for counterclaims; email to clients re: developments; work on letter to Court; numerous conferences re: same, finalization and filing of letter; work on privilege log meet and confer letter, and finalize same; circulate filings, exhibits to clients	7.1	3,266.00
09/09/10	John L. McManus	Primary drafting on letter of response to BSI letter; primary drafting of Declaration in support of letter; work on various edits to the letter; work on follow up re: privilege log letter; work on multiple, lengthy conference calls re: the content of the letter to the Court respecting ESI issues; work on follow up from discovery call with opposing counsel	6.0	2,700.00
09/10/10	Nicoleta Timofti	Review court order and confer with counsel on same; confer with S. Saunders on privilege log letter; edit and revise the letter on revised LR certificate on violation of Court Order 212	2.7	783.00
09/10/10	Sanford M. Saunders, Jr.	Review court order; email and telephone conference with Corky and JMcManus re: same; review draft filing and declaration and edit same; emails with Corky and JMcManus re: same; consult with N[Timofti] re underlying declaration	1.5	937.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
09/10/10	Kenneth A. Horky	Review and analysis of two court orders; teleconference with cocounsel; memo to client explaining developments; calendar multiple newly-scheduled hearings; followup discussion and strategy planning with cocounsel and clients; review further court order; numerous communications with client, cocounsel re: same; work on scheduling preparation meeting for 9/23 hearings; review discovery filings; analysis of defamation caselaw; confer with Bruce March	3.7	1,702.00
09/13/10	Nicoleta Timofti	Confer with S. Saunders on the letter to BSI on privilege log; conference call with S. Saunders, K. Horky and J. McManus on the hearing on September 23; discovery from BSI and deposition dates	1.8	522.00
09/13/10	Sanford M. Saunders, Jr.	Emails re supply edit privilege log letter; telephone conversation with K.Horky re: same; telephone conversation with K.Horky re: strategy	2.2	1,375.00
09/13/10	Kenneth A. Horky	Communications with client, cocounsel re: multiple issues; continue reviewing legal research on possible direct claims; conference call with cocounsel re: further call with Ring, planning for upcoming hearing	1.7	782.00
09/14/10	Nicoleta Timofti	Revise, edit and sent BSI the letter on the privilege log on Fifth Request for Production of Documents	2.0	580.00
09/14/10	Sanford M. Saunders, Jr.	Email correspondence with BSI Counsel; review deposition notice; telephone conversation with K.Horky re: same; edit privilege log letter	2.9	1,812.50
09/14/10	Kenneth A. Horky	Revise and finalize privilege log letter; communications with Sandy Saunders re: same	0.6	276.00
09/14/10	John L. McManus	Multiple communications re: privilege log letter	0.5	225.00
09/30/10	Nicoleta Timofti	Revise and edit the motion to compel BSI on the fifth request for documents; reviewed the recent court orders; email correspondence with counsel on same	1.6	464.00

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Attorneys' Fees re Motion to Dismiss for Fraud on the Court

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
10/01/10	Kenneth A. Horky	Work on letter to Court; work on motion to compel production of documents responsive to 5th request for production; review Court Order; review and edit motion to compel 5th request for production; communications with Sandy Saunders re: letter to Court	3.6	1,656.00
10/01/10	Barry A. Dotson	Research files for motion to quash 15 subpoenas; prepare notebooks for overnight delivery to J. McManus; review court docket regarding briefs relating to motion to quash Rothman and Ornitz subpoenas; prepare materials for FedEx to S.Saunders in D.C.	7.8	1,599.00
10/01/10	John L. McManus	Work on drafting letter to Court requesting hearing on Motion for Protective Order and to Quash on Deposition Subpoenas; work on conference call with co-counsel re: status	0.5	225.00
11/02/10	Nicoleta Timofti	Conference call with Dr. Krawetz, counsel and client on the issues related to subpoenas and WAUSA's reply in support to fraud on Court motion	1.9	551.00
11/05/10	Nicoleta Timofti	Review pleadings and cases in preparation for the hearing on November 29th; select the most relevant cases for the arguments to be made; review email correspondence of the opposing counsel on the request to add two additional motions for the hearing; email GT counsel same; review BSI's motion on same; review Court order on deposition of Rothman and Ornitz	5.0	1,450.00
11/05/10	Sanford M. Saunders, Jr.	Emails with BSI re: discovery issues; review court order re: Rothman/Ornitz discovery; email K. Horky re: same	1.2	750.00
11/05/10	John L. McManus	Receive and review of discovery order re: Amanda Ornitz and Michael Rothman Interrogatories; work on forwarding same to expert for his use in generating sample questions	0.3	135.00
11/08/10	Nicoleta Timofti	Continue reviewing cases in preparation for the hearing on the 29th	1.8	522.00

Beyond Systems, Inc. v. World Avenue USA, LLC
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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/09/10	John L. McManus	Work on further drafting of the Interrogatories to Amanda L. Ornitz and to Michael S. Rothman consistent with phone conference call with expert; work on circulation of the draft Ornitz and Rothman interrogatories	4.0	1,800.00
11/10/10	Kenneth A. Horky	Work on interrogatories to opposing counsel; communications with client; work on interrogatories to opposing counsel's assistant; conference call with Neal Krawetz, Homer Appleby and John McManus; review prior discovery responses and extensive further work on interrogatories following call; teleconference with John McManus; teleconference with Sandy Saunders	6.0	2,760.00
11/10/10	John L. McManus	Work extensively on the primary drafting and editing of the Interrogatories to Michael Rothman and Amanda Ornitz; work on telephone call with expert re: same; work on telephone call with clients re: same; work on discussion with co-counsel re: same; continued work on extensive editing re: Interrogatories; review of final emails re: same	4.2	1,890.00
11/12/10	Barry A. Dotson	Begin research and collection of materials to prepare briefing books for November 29 hearing on various motions	1.0	205.00
11/15/10	Nicoleta Timofti	Prepare for the November 29th hearing	1.4	406.00
11/15/10	Barry A. Dotson	Continue reviewing and collecting materials in preparation for November 29 hearing	0.8	164.00
11/16/10	Sanford M. Saunders, Jr.	Consult with J. Przygodzki re: hearing prep	0.5	312.50
11/17/10	Jozef S. Przygodzki	Prepare cited case binders for hearing	2.0	440.00
11/17/10	Nicoleta Timofti	Conference call with Clerk of Judge Messitte re two new motions set for hearing on November 29th; confer with counsel on same; review Court's Order on same; review briefs and case law in preparation for the Court hearing	4.5	1,305.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/17/10	Barry A. Dotson	Review court order placing two additional motions on hearing calendar for 29th; prepare additional binders for new motions and related briefs; final preparation of binders to send for duplicating and assembly	2.5	512.50
11/18/10	Jozef S. Przygodzki	Prepare materials/binders for hearings	1.0	220.00
11/18/10	Nicoleta Timofti	Review briefs and case law in preparation for the court hearing on the 29th; draft outline of the arguments	2.5	725.00
11/18/10	John L. McManus	Work on drafting of motion to compel respecting Order at DE 212; incorporate in Declaration; work on incorporating in the changes to the Declaration; work on motion to amend; draft motion to amend; work on local rule 104 re motion to compel; circulate amended answer, motion to amend, motion to compel, and local rule 104 certification	5.0	2,250.00
11/19/10	Nicoleta Timofti	Review the Renewed Motion to Enforce Court Order at DE 212, with the final Krawetz Declaration; review cases and briefs in preparation for the hearing	3.0	870.00
11/19/10	Barry A. Dotson	Work with renewed motion to enforce court order and review files to identify and collect exhibits	2.0	410.00
11/20/10	Nicoleta Timofti	Review briefs and cases in preparation for the court hearing	1.5	435.00
11/21/10	Sanford M. Saunders, Jr.	Travel to FTL re: hearing preparation	2.0	1,250.00
11/21/10	Nicoleta Timofti	Review pleadings in preparation for the court hearing; Travel from Washington, DC to Ft. Lauderdale for meeting with clients in preparation for the hearing	2.0	580.00
11/22/10	Jozef S. Przygodzki	Prepare draft exhibits for hearing (BSI Misquotes, hearing excerpts, order). Prepare materials for hearing	1.0	220.00
11/22/10	Nicoleta Timofti	Meet and confer with K.Horky, J.McManus and S.Saunders to prepare for the hearing on November 29th; review multiple briefs and outline the arguments	1.0	290.00
11/22/10	John L. McManus	Continued meeting with co-counsel re: upcoming hearing on the 29th of November	1.0	450.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/23/10	Nicoleta Timofti	Review multiple pleadings in preparation for the hearing; confer with counsel on same; confer with counsel on the settlement discussions; travel back to Washington, DC from Ft. Lauderdale	2.0	580.00
11/23/10	Sanford M. Saunders, Jr.	Hearing preparation	2.5	1,562.50
11/23/10	John L. McManus	Early morning meeting on preparation for upcoming November 29th hearing	1.0	450.00
11/24/10	Nicoleta Timofti	Review in preparation for the hearing on November 29th; confer with J.McManus, H.Appleby and Dr. Krawetz on his declaration in support of WAUSA's Reply in support of motion to dismiss for fraud on Court	3.0	870.00
11/24/10	Sanford M. Saunders, Jr.	Hearing preparation	1.0	625.00
11/24/10	Jozef S. Przygodzki	Prepare hearing exhibits, materials for court. Hearing preparation	4.5	990.00
11/26/10	Sanford M. Saunders, Jr.	Hearing preparation and draft Reply to Motion for Fraud on the Court	3.5	2,187.50
11/26/10	Nicoleta Timofti	Review pleadings, cases and documents in preparation for the court hearing	0.5	145.00
11/26/10	John L. McManus	Read and review of the Michael S. Rothman and Amanda L. Ornitz Answers to Interrogatories; Work on incorporation of comments of co-counsel in the Reply Memorandum in Support of Motion to Dismiss for Fraud On the Court; work on finalization of Reply Memorandum and all exhibits and work on filing same	4.5	2,025.00
11/26/10	Kenneth A. Horky	Review Ornitz and Rothman interrogatory answers; prepare memo on key points; deficiency areas where they refused to answer questions	1.1	506.00
11/27/10	Jozef S. Przygodzki	Prepare exhibits and materials for court in preparation of hearing	2.7	594.00
11/27/10	Sanford M. Saunders, Jr.	Hearing preparation; emails with K.Horky, J.McManus and N.[Timofti] re: same	1.5	937.50
11/27/10	Nicoleta Timofti	Review documents and prepare exhibits for the hearing on 29th; confer with S. Saunders on same; review the outlines of the arguments; select cases to be used in support of arguments; confer with law clerk on multiple exhibits	1.0	290.00
11/28/10	Jozef S. Przygodzki	Prepare exhibits for hearing. Assist with hearing preparation	3.5	770.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
11/28/10	Sanford M. Saunders, Jr.	Hearing preparation; meeting with K. Horky, J. McManus re: same	3.0	1,875.00
11/28/10	Nicoleta Timofti	Confer with S. Saunders, K. Horky and J. McManus in preparation for the hearing on the seventh motions scheduled for Nov. 29th; review multiple documents and prepare exhibits; coordinate with law clerk on same	3.0	870.00
11/28/10	John L. McManus	Work on travel to DC and en route, work on preparation of issues for upcoming hearing; work on extremely lengthy meeting with co-counsel to prepare for upcoming hearing on all pending Motions; work on follow-up discussion re: same	2.0	900.00
11/28/10	Kenneth A. Horky	Travel to Washington D.C. for hearing preparation; all day and all evening hearing preparation for seven pending motions	2.0	920.00
11/29/10	Jozef S. Przygodzki	Prepare for and attend court hearing	3.7	814.00
11/29/10	Nicoleta Timofti	Final preparation for the hearing; confer with counsel on same; participate in the hearing	2.0	580.00
11/29/10	Sanford M. Saunders, Jr.	Preparation and attend hearing	2.0	1,250.00
11/29/10	John L. McManus	Work on preparation for hearing on all pending motions; work on attendance at hearing on all pending motions; work on travel from DC	0.2	90.00
11/29/10	Kenneth A. Horky	Further preparation for and attendance at hearings	0.2	92.00
Totals			850.3	331,936.50

TIMEKEEPER	HOURS	AMOUNT
Justin Angelo, Esq.	66.2	\$21,846.00
Patricia M. Casey, Esq.	47.3	\$10,879.00
Kenneth A. Horky, Esq.	207	\$95,220.00
John L. McManus, Esq.	172.3	\$77,535.00
Sanford M. Saunders, Jr., Esq.	85.5	\$53,437.50
Nicoleta Timofti, Esq.	199.2	\$57,768.00
Jozef S. Przygodzki, Law Clerk	21.8	\$4,796.00
Barry A. Dotson, Paralegal	51.0	\$10,455.00
Totals:	850.3	\$331,936.50